



Together We Can Change  
National Markets

November 21, 2003

Ms. Rachel Schmeltz  
Ariel Rios Building, Room #947G  
1200 Pennsylvania Ave, NW  
Mailcode 6202J  
Washington, D.C. 20460

Dear Ms. Schmeltz:

The Consortium for Energy Efficiency's (CEE) Commercial Refrigeration Committee submits the following comments regarding the Draft 2 Vending machine specification and Draft 1 Retrofit program. In general, CEE members are not planning on implementing incentive programs for new ENERGY STAR machines, though some are planning on promoting the specification to site owners for integration into vending machine leasing agreements. Given this, individual organizations have not signed onto this letter, and these general comments are offered by the Commercial Refrigeration Committee for your consideration.

*Vending Machine Specification – Draft 2*

- The Committee supports the Environmental Protection Agency's decision to proceed with the new vending machine specification for January 2004 while addressing the energy use of existing machines for 2005. The Committee appreciates the energy savings opportunity and market conditions that make addressing the existing base important to the successful transformation of the vending machine market.
- At this time, the Committee does not support the inclusion of glass front vending machines until actual performance data on glass front machines can be compiled in order to assess the reasonableness of potential Energy Star levels. The Committee recommends that as additional glass front units enter the market, EPA evaluate their energy use to identify if there is a need for a separate specification.
- The Committee requests that the ENERGY STAR vending machine qualifying products list provide the energy use of the machine. Data on the energy use of each unit allows energy efficiency program administrators to claim and verify any additional savings they may attain when promoting ENERGY STAR vending machine units.
- The Committee supports EPA's decision to allow ENERGY STAR machines to be identified on the front or the side plate. The committee understands the market implications of requiring the label on the front and supports this compromise. The Committee also feels that the identified options for label placement should adequately ensure that the machine is easily identifiable to the site owner as ENERGY STAR.



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*Refurbished Machines Program – Draft 1*

As stated previously, the Commercial Refrigeration Committee supports this effort to address the energy efficiency of the existing base of vending machines.

The Committee is also very supportive of the use of a single energy specification for both new and existing machines. The Committee believes this is integral to the integrity of the ENERGY STAR label.

The Committee had no other comments on the current draft of the refurbishment program and looks forward to commenting on its further development as the details are clarified.

Thank you for this opportunity to comment.

Sincerely,

Rachael Shwom  
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Consortium for Energy Efficiency  
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